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MEMO ENDORSED

April 11, 2023

BY ECF

Hon. Louis L. Stanton, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 21C
New York, NY 10007

Re: Abrams v. UY Trading Ltd. et al.
Case No. 20-cv-5174

Dear Judge Stanton:

Pursuant to the Court's Order dated January 6, 2023, your Honor granted Jaffe & Asher LLP's motion to withdraw as counsel for Defendants "effective upon defendants' completion of production of documents and other materials in compliance with the plaintiff's demands."

I write to advise the Court that Jaffe & Asher LLP has exhausted its efforts to complete Defendants' document production. Specifically, Defendants have addressed the discovery deficiencies identified by Plaintiff's counsel in his letter to me dated February 22, 2023 in two ways. First, Defendants produced additional documents. Second, Defendant Sandra Piedrabuena has provided a Declaration testifying that Defendants have produced all documents responsive to Plaintiff's document request in their possession, custody or control. We prepared a substantially similar declaration for Defendant Russell Abrams, but he has not signed it.

Moreover, not only have we exhausted our efforts to complete Defendants' document production, but it is now impossible for us to represent Defendants any further. Jaffe & Asher LLP filed suit against Russell Abrams and Sandra Piedrabuena to recover unpaid legal fees in this case and others in a lawsuit styled *Jaffe & Asher LLP v. Russell Abrams and Sandra Abrams, a/k/a Sandra Piedrabuena*, filed in the Supreme Court of New York, County of New York, Index No. 651270/2023.

Accordingly, we respectfully request that the Court determine that Jaffe & Asher LLP is no longer required to represent Defendants in any capacity, including with any continued production of documents and other materials in compliance with Plaintiff's demands.

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We thank your Honor for the Court's consideration of this request.

Respectfully yours,

s/ Gregory E. Galterio, Esq.
Gregory E. Galterio, Esq.

cc: All counsel (via ECF)